

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF RHODE ISLAND**

**IN RE:** **Lisa M. McConaghy**

**BK. NO. 18-10155**  
**Chapter 13**

DEBTOR'S OBJECTION TO MOTION FOR RELIEF  
FILED BY FEDERAL NATIONAL MORTGAGE ASSOCIATION ("FANNIE MAE")  
C/O SETERUS, INC.

Now comes the Debtor, Lisa M. McConaghy, by her attorney, John S. Simonian, and hereby objects to the Motion for Relief from Stay filed by Federal National Mortgage Association (“Fannie Mae”), creditor c/o Seterus, Inc., on the following grounds:

The Debtor will file an amended Plan to cure the mortgage arrears.

WHEREFORE, the Debtor respectfully requests this Honorable Court to deny the Motion for Relief from Stay filed by Federal National Mortgage Association (“Fannie Mae”), creditor c/o Seterus, Inc., for the reasons stated *supra*.

Debtor, by her Attorney  
**Lisa M. McConaghy**

/s/ John S. Simonian  
**John S. Simonian, Esq., #4694**  
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 401/785-8313 (fax)  
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## CERTIFICATE OF SERVICE

The undersigned (Attorney for the “Debtor”) hereby certifies that on the 26th day of December, 2018, a copy of the within Objection to Motion for Relief was served to the following:

John Boyajian, Esq.  
Chap 13 Trustee  
*Via Electronic Notice of Filing*

Counsel for Movant  
Michael E. Swain, Esq. 8190  
Orlans PC  
*Via Electronic Notice of Filing*

/s/ John S. Simonian  
**John S. Simonian**